

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JORGE LEONARDO HERNANDEZ-
ROMERO,

Defendant.

8:25CR77

INDICTMENT
18 U.S.C. § 1956(h)

The Grand Jury Charges:

COUNT I

1. From on or about May 7, 2022, and continuing to on or about December 14, 2022, in the District of Nebraska and elsewhere, the defendant JORGE LEONARDO HERNANDEZ-ROMERO knowingly and intentionally combined, conspired, confederated and agreed with other persons known and unknown to the Grand Jury, to commit an offense against the United States in violation of Title 18, United States Code, Section 1956, to wit:

a. To transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments or funds involving the proceeds of specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute methamphetamine, in violation of Title 21 United States Code, 841 and 846, from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to avoid a transaction reporting requirement under State or Federal law, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(ii) and 2.

MANNER AND MEANS

1. The manner and means used to accomplish the objectives of the conspiracy included, among other things, the following:

2. It was part of the conspiracy for the Defendant, JORGE LEONARDO HERNANDEZ-ROMERO, to receive United States Currency (USC) from another individual, Alejandro Escamilla, who sold and distributed methamphetamine in the District of Nebraska, for the purpose of the Defendant, JORGE LEONARDO HERNANDEZ-ROMERO, to structure USC in amounts less than \$3,000.00, normally in \$1,000.00 increments.

3. It was further part of the conspiracy that after the Defendant, JORGE LEONARDO HERNANDEZ-ROMERO, structured the USC, he would direct and cause other individuals to transport, transmit, or transfer, a monetary instrument, or funds, by direction the individuals to send a money wire transfer through a Money Service Business (MSB), located in the District of Nebraska, to a recipient in Mexico.

4. It was further part of the conspiracy that the Defendant, JORGE LEONARDO HERNANDEZ-ROMERO, began receiving the proceeds from the methamphetamine sales, structuring the USC, and directing others to remit money wire transfers as early as September 2022. The conspiracy is known to have a start date as early as on or about May 7, 2022, when a money wire transfer was sent from Marco Antonio Mariscal Salmeron, an identity, or person, known to have been directed, or used, by the Defendant, JORGE LEONARDO HERNANDEZ-ROMERO, to send USC to Mexico, wired \$500.00 from the District of Nebraska, to Angelina Salmeron Ventura in Uruapan, Michoacan, Mexico.

5. It was further part of the conspiracy that Defendant, JORGE LEONARDO HERNANDEZ-ROMERO, would maintain money wire receipts, either as documentation showing the funds were sent, or to provide the necessary number for the recipient to receive cash

in Mexico. The 79 money wire transfers found in Defendant's possession were from the period of December 6, 2022 through December 14, 2022.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

1. The allegations contained in Count I of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(1).

2. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956, the defendant, JORGE LEONARDO HERNANDEZ-ROMERO, shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

a. \$107,250.00 in United States Currency which was transmitted, or transferred, from the United States to Mexico.

b. A Money Judgment against JORGE LEONARDO HERNANDEZ-ROMERO in favor of the United States of America;

Said Judgment equal to the value of the property constituting, or derived from, any proceeds the Defendant obtained, directly or indirectly, as a result of the offense alleged in Count I of this Indictment, Laundering and Conspiracy to Launder Monetary Instruments, in violation of Title 18, United States Code, Section 1956; and

3. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON 

The United States of America requests that trial of this case be held at Omaha, Nebraska, pursuant to the rules of this Court.


MIKALA PURDY-STEENHOLDT
Assistant U.S. Attorney